

EXHIBIT 2

BAKER & HOSTETLER LLP

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*Attorneys for Irving H. Picard, Esq., Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

Plaintiff,

v.

Adv. Pro. No. 10-_____ (BRL)

Defendant(s).

CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order Approving Litigation Case Management Procedures for Avoidance Actions [Docket No. _____] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (BRL), on _____, 2010 the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures shall be due: _____ 2011 [Within the later of (i) sixty (60) days of the Initial Case Conference and (ii) one hundred eighty (180) days after the date the Complaint was filed]
2. Fact Discovery shall be completed by: _____ 2011 [Must be completed within 210 days after the Initial Case Conference]
3. The Deadline for Service of Substantive Interrogatories shall be: _____ 2011 [Ninety (90) days prior the completion of fact discovery]
4. The Disclosure of Case-in-Chief Experts shall be due: _____ 2011 [Within sixty (60) days after the deadline for completion of fact discovery]
5. The Disclosure of Rebuttal Experts shall be due: _____ 2011 [Within ninety (90) days after the deadline for completion of fact discovery]
6. The Deadline for Completion of Expert Discovery shall be: _____ 2011 [Within 180 days after the deadline for completion of fact discovery]
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: _____ 2011 [Within 14 days after the filing of the Notice of Mediation Referral]
8. The Deadline for Conclusion of Mediation shall be: _____ 2011 [Within 120 days of the date of the Notice of Mediator Selection, which deadline may be extended by the mutual consent of the parties to the mediation and the mediator]

Dated: New York, New York
_____, 201__

BAKER & HOSTETLER LLP

By: _____

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